

Lawrence A. Garvey, Esq.
Garvey Cushner & Associates, PLLC
50 Main Street, Suite 390
White Plains, New York 1006
(914) 946-2200
lgarvey@thegcafirm.com
Attorneys for Plaintiff Jerry Zandman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JERRY ZANDMAN

Case No.: 7:18-cv00791 (NSR)

Plaintiff,

**RULE 26(A)(1)
DISCLOSURES**

-AGAINST-

CITIBANK, N.A., CITI® CARDS, and
THE NEW YORK YANKEES PARTNERSHIP
DBA THE NEW YORK YANKEES BASEBALL
CLUB,

Defendants.

-----X

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a), plaintiff, Jerry Zandman, (the "Plaintiff") hereby serves these Initial Disclosures to Defendants Citibank, N.A., Citi® Cards, and The New York Yankees Partnership DBA The New York Yankees Baseball Club (hereinafter, collectively referred to as the "Defendants"). Appendix A of these disclosures identifies those individuals who may have discoverable and relevant information to the disputed facts alleged with particularity in the pleadings. Appendix B to these disclosures describes the documents, data compilations, and tangible things held by the Plaintiff that may be relevant to disputed facts alleged with particularity in the pleadings. Appendix C to these disclosures describes the categories of damages asserted by the Plaintiff.

These disclosures do not include the names of any potential experts retained or consulted by the Plaintiff. The Plaintiff will produce information relating to experts as may be appropriate under Federal Rule of Civil Procedure 26(a)(2) at the times provided by that Rule or any supervening order of the Court. In addition, the disclosures do not include the names of current or former officers, directors, or employees of the Defendants, nor do they include documents produced by the Defendants.

These disclosures do not constitute waiver of any work product protection and are without prejudice to any other issue or argument.

Dated: White Plains, New York
March 5, 2018

LAWRENCE A. GARVEY & ASSOCIATES, P.C.

BY: /s/ Lawrence A. Garvey
Lawrence A. Garvey, Esq.
Attorneys for the Plaintiff
50 Main Street, Suite 390
White Plains, NY 10606
(914) 946-2200
(914) 946-1300
Lgarvey@laglawfirm.com

APPENDIX A

Individuals likely to have discoverable information:

1. Jerry Zandman
2. Current and/or former officers, directors, or employees of the Defendants, the names for whom are unknown at this time

APPENDIX B

Documents, data compilations, and tangible things held by the Plaintiff that may be relevant to disputed facts:

1. Citibank, N.A. and Citi® Cards credit card statements
2. Documents concerning the disputed credit card charges

APPENDIX C

Categories of damages claimed:

1. Credit card charges wrongfully made by the New York Yankees
2. Amounts wrongfully assessed by Citibank, N.A. to the credit card account of Plaintiff